

IN THE NORTHERN DISTRICT OF OKLAHOMA
UNITED STATES OF AMERICA

(1) PHILIP SANDERS, an
Individual and Husband and
Next of Kin of BRENDA JEAN
SANDERS, Deceased,

Plaintiff,

-vs-

No. 17-cv-492-JHP-FHM

(1) CREEK COUNTY BOARD OF
COUNTY COMMISSIONERS, and
(2) SHERIFF BRET BOWLING,
in his official capacity as
Creek County Sheriff, and
(3) TURN KEY HEALTH CLINICS,
a limited liability company,

Defendants.

DEPOSITION OF NICHOLAS GROOM

TAKEN ON BEHALF OF THE PLAINTIFF

TAKEN AT 7447 SOUTH LEWIS AVENUE

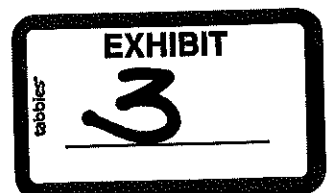
TULSA, OKLAHOMA

MAY 6, 2020

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REPORTED BY: RACHAEL A. ROPER, RPR

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1 Q. And you're an LPN?

2 A. Yes.

3 Q. What's the board you're licensed through?

4 A. Oklahoma Board of Nursing.

5 Q. Ever had any complaints filed against you with the  
6 Oklahoma Board of Nursing?

7 A. No.

8 Q. Ever been terminated from a job?

9 A. No.

10 Q. Ever left a job because --

11 A. It wasn't a nursing job - I take that back - it was  
12 a registration job that they weren't really doing  
13 any more on their moving. I was laid off but I got  
14 unemployment, so I wasn't really terminated for  
15 cause or anything like that, but to answer your  
16 question, I mean, yes.

17 Q. Finished your LPN in 2014?

18 A. Yes, I believe so.

19 Q. Where did you go to work after that?

20 A. Rainbow Nursing Home in Bristow.

21 Q. How long were you there?

22 A. I was there till January '16 when I started with  
23 Turn Key at the Creek County Justice Center.

24 Q. January 2016?

25 A. January of 2016. I believe it was the 21st right

1 before my birthday.

2 Q. What led you to leave Rainbow Nursing?

3 A. I got the offer and found out about the job. You  
4 know, it was just a change, new opportunity.

5 Q. What were you doing at Rainbow Nursing?

6 A. Just standard LPN duties: wound care and finger  
7 sticks and doing insulin. Just managing the  
8 day-to-day health aides of the residents there,  
9 calling the doctors if I saw anything, things like  
10 that.

11 Q. What's your understanding as to the limits for an  
12 LPN on what type of treatment that you give or  
13 diagnosing?

14 A. You can't diagnose as a nurse. We don't diagnose;  
15 that's for the physicians. Basic procedure. Any  
16 kind of cutting, anything like that, even clipping a  
17 diabetic's toenails, you know, you wouldn't do that.  
18 Full nursing assessments, that's done by an RN.  
19 Just small, specific things procedure-wise.

20 Q. How many hours are required for a LPN license?

21 A. I couldn't give you the specific hours needed. I  
22 know our program was 12, 15 or 18 months. You just  
23 had to complete all your coursework and it was just  
24 self paced, so the definite hours I couldn't tell  
25 you.

1 Q. Have you ever applied to college to get a nursing  
2 license?

3 A. Beyond the LPN?

4 Q. Yes.

5 A. Yes, I applied and was accepted to Langston for my  
6 Bachelor's. Just some things come up and it wasn't  
7 the right time, so I didn't end up going when I did  
8 apply and get accepted.

9 Q. When was that?

10 A. I couldn't tell you the exact year.

11 Q. Do you have a range of years?

12 A. I think I did twice, like maybe once in 2008, which  
13 would have been even before I had a nursing license,  
14 and I think in '15 I may have talked to them too as  
15 well, but I'm not sure. I think it was around that  
16 time.

17 Q. How did you find out about an opportunity to work  
18 at Turn Key?

19 A. My -- I think it was my mother told me about it  
20 actually through someone she knew at the company,  
21 Flint Junod, and then I called him and we set up an  
22 interview with the boss at Creek County and went  
23 from there.

24 Q. Your mom's name?

25 A. Vicki Groom, V-i-c-k-i.